

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

JAMES COTEREL,	)	
	)	
and	)	
	)	
CRYSTAL NAYLOR,	)	
	)	
Plaintiffs,	)	Case No. 2:13-cv-4218
	)	
v.	)	
	)	
DOREL JUVENILE GROUP, INC.,	)	
d/b/a Safety 1st	)	
	)	
Defendants.	)	

**NOTICE OF DEPOSITION DUCES TECUM OF JOHN STERBA**

PLEASE TAKE NOTICE that in accordance with Federal Rule of Civil Procedure 30, Defendant, Dorel Juvenile Group, Inc., will take the deposition upon oral examination of John Sterba, an expert witness disclosed by plaintiffs on October 10, 2010, beginning at 10:00 a.m. Eastern. The deposition will be conducted at the offices of the court reporter, Jack W. Hunt & Associates, Inc., 1120 Liberty Building, 424 Main Street, Buffalo, New York 14202. The deposition will be recorded by stenographic means.

To allow the deposition to be conducted efficiently, the witness is requested to produce at a mutually convenient time prior to his deposition the materials described in Exhibit A. Those materials shall be produced in accordance with the instructions provided on Exhibit A. Defendant will reimburse the witness for the copying costs associated with providing a hard copy or PDF copy of the documents.

Date: September 23, 2014

Respectfully submitted,

**BERKOWITZ OLIVER WILLIAMS  
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By: /s/ Thomas P. Schult

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**ATTORNEYS FOR DEFENDANT DOREL  
JUVENILE GROUP, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of September 2014, the foregoing Notice of Deposition Duces Tecum of John Sterba was electronically filed with the clerk of the court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record:

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**Attorney for Defendant Dorel Juvenile Group,  
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